



February 11, 2010

Ann Olson
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Sacramento, CA 95670

RE: Tentative Order Revised Waste Discharge Requirements for Musco Family Olive Company and the Studley Company Wastewater Treatment and Land Disposal Facility.

Dear Ms. Olson:

The California League of Food Processors (CLFP) appreciates the opportunity to provide comments to the Central Valley Regional Water Quality Control Board regarding proposed revised Waste Discharge Requirements for the Musco Family Olive Company and the Studley Company Wastewater Treatment and Land Disposal Facility.

The food processing industry is one of the key components of the economy of California's Central Valley. California is the leading U.S. producer of processed olives, tomatoes, raisins, canned fruits and vegetables, dehydrated vegetables, and numerous other commodities which are sold to consumers around the world.

Food processors directly employ over 220,000 workers in California, generating nearly \$40 billion in sales revenue and \$10 billion in annual labor income. Numerous California packaging suppliers, energy providers, truckers, and other companies rely on food processors like Musco as an important market for their products.

Many farmers depend on processors for a market for their crop. Over 300,000 acres of farmland in California are devoted to growing crops for processing. Processing plants are the hub of economic activity in many rural communities in the Central Valley, accounting for a large portion of employment, income, and tax revenue. A study by the University of California found that every job created in the food processing sector generates an additional 2.3 jobs in the rest of the economy, and every new dollar in food processing wages also generates \$1.82 in income in other sectors.

Musco Family Olive Company is committed to environmental stewardship and to complying with the wastewater management standards applied by the Central Valley Regional Water Board. Musco, like other members of the California League of Food Processors, is experiencing

tightening regulatory requirements on its process wastewaters. Musco has been innovative and an industry leader in addressing its process wastewater issues. In its development of Best Management Practices, it has managed to reduce its salt loading by 32%, while substantially reducing the amount of water used in processing olives. This level of performance should be commended. Musco has also developed a NyPa grass, a salt tolerant grass, into a viable, sustainable forage crop, capable of extracting salts from the applied process water. Another important accomplishment by Musco is its biomass system, RENEWS, which uses as a biomass source the olive pits from its processing plant as a fuel to treat its most concentrated wastewater, to yield a usable, high quality water supply. CLFP believes that these innovations by Musco will greatly assist the food processing industry in meeting requirements on wastewater application.

Musco is also a vital industry to the region, providing over 225 full-time jobs and supporting more than 200 grower families. During the economic downturn that California and the nation have endured, Musco has been an economic engine that has provided necessary jobs for the local community. It is important to note that not only has Musco dealt with many process wastewater issues, but it has also been actively involved in assisting in statewide programs to develop solutions to salinity issues in the Central Valley, such as the CV-Salts Program. It is because of this unselfish and progressive attitude of Musco that CLFP is supporting Musco in the Regional Board's consideration of Tentative Waste Discharge Requirements today.

CLFP urges the Board to adopt the WDR for Musco Family Olive Company as proposed. Musco is committed to meeting its obligations and CLFP is confident that it will meet that goal.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rob Neenan", with a long horizontal flourish extending to the right.

Rob Neenan
Vice President, Government Affairs
California League of Food Processors
1755 Creekside Oaks Drive
Suite 250
Sacramento, CA 95833

